



**Transportation
Technical
Services, Inc.**

500 Lafayette Blvd. - Suite 230
Fredericksburg, Virginia 22401
Toll free: 888-ONLY-TTS
FAX: 540-899-1948
HOME PAGE: <http://www.ttstrucks.com>
EMAIL: ttstruck@illuminet.net

DEPARTMENT OF TRANSPORTATION

97 OCT 20 PM 2:40

October 17, 1997

DOCKET SECTION

Docket Clerk
Docket No. BTS-97-2859 - 5
Department of Transportation
400 Seventh Street, S.W.
Room PL-401
Washington, D.C. 20590

27917
OA



Subject: Docket BTS-97-2859, Notice 97-7
Proposed Agency Information Collection Activity; Comment Request

Dear Sir/Madam:

Transportation Technical Services, Inc. (TTS) is a private organization supplying trucking information to the public. Among our numerous data bases and publications is the TTS Blue Book of Trucking Companies, a compilation of facts based on motor carrier financial reports Forms M-1 and M-2 filed with the Department of Transportation's Bureau of Transportation Statistics (BTS). Our clients for this important information include trucking companies, industry suppliers, consultants, academics, and analysts in both the private and public sectors.

TTS was a participant in the March 31, 1997 Issues Forum relating to BTS's Motor Carrier Financial and Operating Data Collection Program. The purpose of this Issues Forum was to discuss the feasibility of establishing a negotiated rulemaking committee to address all matters of future motor carrier reporting, including what financial and operating information about motor carriers is needed for statistical, safety, and other purposes, what other sources exist, what data collection approach minimizes the reporting burden, data needs versus competitive harm and confidentiality, categories of reporting and non-reporting carriers, and carrier-specific data availability. The recommendations of the committee would then be put before the general public in a formal rulemaking proceeding. TTS hopes to be included on the final committee, and if so, intends to participate fully and constructively in the resolution of these motor carrier financial and operating data reporting issues.

The concern in this instant docket (BTS-97-2859) is renewal of Office of Management and Budget (OMB) approval of Forms M-1, M-2, and QFR. However, the docket also requests comments on many of the same issues BTS proposes to address in the formal rulemaking discussed above. TTS suggests that the formal rulemaking is the proper forum in which to address the broad issues of motor carrier reporting, and not this instant docket.

2pg

TTS suggests that BTS should seek renewed OMB approval of Forms M-1, M-2 and QFR with all due diligence, putting this technicality behind us, and then move forward with the formal rulemaking.

In answer to specific questions posed by BTS, TTS asserts that:

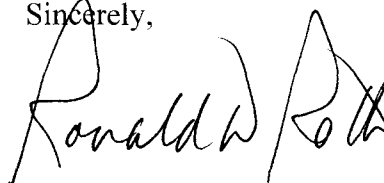
- a) Congress established the mandate for BTS to collect motor carrier financial and operating data under U.S.C. § 14123.
- b) In this day of computerization and automation, the burden should be as low as a matter of minutes for carriers to generate all data required for Forms QFR, M-1, or M-2 from their internal financial and operating records. Likewise, completing the BTS reports could be a matter of minutes for automated/computerized carriers, or somewhat longer if handwritten. All else being equal, one might expect the reporting burden to be more pronounced on smaller, less sophisticated carriers. However, in recognition of this, smaller carriers currently file a significantly abbreviated report form.

The motor carrier industry has been ahead of the curve in reducing reporting burdens. On numerous previous occasions, under the auspices of the Interstate Commerce Commission, carrier report forms have been reduced in size. The scope of reporting has been reduced, and certain classes of very small motor carrier have been exempted from reporting. The current report forms reflect the bare minimum of financial and operating data required for statistical analysis, and some additional data will likely be required to effectively analyze motor carrier safety.

- c) Congress established the mandate for BTS to collect the data in recognition that no other practical data collection alternative existed. The formal rulemaking should be the forum to address the quality, utility, or clarity of the information collected.
- d) Automated collection techniques or other forms of information technology should be employed to the extent they facilitate a further reduction in reporting burden and expedite the assimilation of the data at BTS.

TTS encourages BTS to expeditiously secure OMB approval of motor carrier financial and operating report Forms M-1, M-2, and QFR, and to then move forward on the broader issues of motor carrier reporting requirements. TTS looks forward to a continued participation in the comprehensive rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald D. Roth". The signature is stylized with large, sweeping loops and a prominent "R" at the beginning.

Ronald D. Roth
Executive Vice President